

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 04-30034-MAP
)	
)	
MICHAEL CROOKER,)	
Defendant.)	

Government's Motion to Extend
Time and to Reschedule Sentencing

(Assented To)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court: (1) extend the government's time to file its response to Mr. Crooker's sentencing memorandum for 24 days to Monday, June 4, 2007, and (2) reschedule Mr. Crooker's sentencing from May 23, 2007, to June 7th or 8th or a date after June 18, 2007.

The attorney for the government responsible for filing this motion has been working on other matters within the U.S. Attorney's Office, including preparing for and arguing the appeal in United States v. Teleguz, No. 06-1751, gathering twenty-one day pretrial discovery and preparing for trial in United States v. Goyette, 05-30014-MAP, and preparing the government's speedy trial submission in United States v. Winston, 04-30034-MAP. As a result, he was unable to file the government's response by the original due date, May 11, 2007.

Mr. Crooker's sentencing has been delayed previously at his request so that he could obtain new counsel and prepare a substantial sentencing memorandum. The government seeks additional time to respond to these arguments.

Mr. Crooker's attorney, Timothy G. Watkins, Esq., has assented to this motion. Mr. Watkins is scheduled to be on trial before Judge Zobel on June 4th and he will be away during the week of June 11th. As a result, he requests that Mr. Crooker's sentencing be rescheduled for June 7th or 8th or after June 18th.

Respectfully submitted,
MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: May 21, 2007

Certificate of Service

May 21, 2007

I certify that I caused the foregoing document to be served via ECF and fax on counsel for the defendant, Timothy G. Watkins, Federal Defender Office, 408 Atlantic Avenue, 3rd Floor, Boston, MA 02110.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney